

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

One Apple account: kylecbenton@gmail.com, more
fully described in Attachment A

Case No. MJ24-781

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

One Apple account: kylecbenton@gmail.com, more fully described in Attachment A

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 922(o)	Unlawful possession of a machinegun
26 U.S.C. §§ 5861(d), 5845(a)(3)	Receive or possess a firearm which is not registered to the possessor
18 U.S.C. § 372	Solicitation to commit a crime of violence

The application is based on these facts:

- ☒ See Affidavit of Special Agent Joseph Rico, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



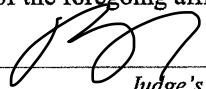
Applicant's signature

Joseph Rico, Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 12/13/2024



Judge's signature

City and state: Seattle, Washington

Brian A. Tsuchida, United States Magistrate Judge

Printed name and title

1 knowledge of the events and circumstances described herein; and information gained
2 through my training and experience. Because this Affidavit is being submitted for the
3 limited purpose of securing the requested search warrant, I have not included every fact
4 known to me concerning this investigation. I have set forth only those facts that I believe
5 are relevant to determination of probable cause to support the issuance of the requested
6 warrant. When the statements of others are set forth in this Affidavit, they are set forth in
7 substance and in part.

8 **INTRODUCTION AND PURPOSE OF AFFIDAVIT**

9 3. I make this affidavit in support of an application for a search warrant for
10 information associated with a certain account, kylecbenton@gmail.com ("TARGET
11 ACCOUNT") that is stored at the premises owned, maintained, controlled or operated by
12 Apple, Inc. ("Apple"), an electronic communications service and/or remote computing
13 service provider headquartered at One Apple Park Way, Cupertino, California 95014.
14 The information to be searched is described in the following paragraphs and in
15 Attachment A. This affidavit is made in support of an application for a search warrant
16 under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Apple to
17 disclose to the government copies of the information (including the content of
18 communications) further described in Section I of Attachment B. Upon receipt of the
19 information described in Section I of Attachment B, government-authorized persons will
20 review that information to locate the items described in Section II of Attachment B.

21 4. Based on my training and experience and the facts as set forth in this
22 affidavit, there is probable cause to believe that violations of 18 U.S.C. § 922(o),
23 unlawful possession of a machinegun; 26 U.S.C. §§ 5861(d) and 5845(a)(3), to receive or
24 possess a firearm which is not registered to the possessor in the National Firearms
25 Registration and Transfer Record; 18 U.S.C. § 933, trafficking in firearms; 18 U.S.C. §
26 641, stealing or retaining stolen property of the United States; 18 U.S.C. § 373,
27 solicitation to commit a crime of violence; 18 U.S.C. § 372, conspiracy to impede or

injure an officer; 18 U.S.C. § 249, hate crimes; 18 U.S.C. § 231, teaching or demonstrating the use of a firearm or explosive with intent that the teaching be unlawfully used for a civil disorder; and 18 U.S.C. § 875, threats communicated in interstate commerce (hereinafter “Target Offenses”) have been committed by Kyle Benton (hereinafter “BENTON”).

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

SUMMARY OF PROBABLE CAUSE

6. On September 4, 2024, United States Magistrate Judge S. Kate Vaughan, authorized a search warrant under case number MJ24-553 for the search of 330 Maple Avenue, apartment A-1, Snohomish, Washington 98290, a 1996 Ford F-350 bearing Washington license plate AR17684, and the person of BENTON.

7. On September 6, 2024, investigators executed the search warrants related this investigation. Within 330 Maple Avenue, apartment A-1, Snohomish, Washington 98290, which was searched pursuant to a search warrant, investigators located multiple firearms and what appeared to be an uninstalled drop-in auto sear. SA Gregory Heller of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) conducted a preliminary examination of a black M16 type rifle found within the residence.¹ SA Heller performed a function test of the firearm without firing it, and it functioned as a machinegun. Investigators also located a Palmetto State Armory PA-15 5.56x45 caliber rifle, which had a barrel length of less than 16 inches.² BENTON had no items registered

¹ This firearm is similar in appearance as the firearm identified later in this affidavit as FIREARM THREE.

² This firearm is similar in appearance as the firearm identified later in this affidavit as FIREARM TWO.

1 to him on the National Firearms Registration and Transfer Record as of September 6,
2 2024.

3 8. Also on September 6, 2024, investigators met BENTON at a separate
4 location in Snohomish County, Washington. Investigators placed him into custody, and
5 he invoked his right to an attorney. Investigators searched his person pursuant to the
6 warrant and seized one device from his person, an iPhone 14, with IMEI
7 353555371234143.

8 9. Investigators searched BENTON's iPhone 14 pursuant to a search warrant
9 and discovered BENTON had an iCloud account associated to his iPhone, which is linked
10 to the email account kylecbenton@gmail.com ("TARGET ACCOUNT").

11 10. BENTON is charged in United States District Court for the Western
12 District of Washington under case number CR24-162 TL with Unlawful Possession of a
13 Machinegun, in violation of 18 U.S.C. § 922(o) and Possession of an Unregistered
14 Firearm, in violation of 26 U.S.C. §§ 5861(d) and 5845(a)(3).

15 11. Based on my training and experience, and the facts set forth in this
16 affidavit, there is probable cause exists to search TARGET ACCOUNT, described in
17 Attachment A, for evidence, fruits, and instrumentalities, as further described in
18 Attachment B, of crimes, specifically, violations of 18 U.S.C. § 922(o), unlawful
19 possession of a machinegun; 26 U.S.C. §§ 5861(d) and 5845(a)(3), to receive or possess a
20 firearm which is not registered to the possessor in the National Firearms Registration and
21 Transfer Record; 18 U.S.C. § 933, trafficking in firearms; 18 U.S.C. § 641, stealing or
22 retaining stolen property of the United States; 18 U.S.C. § 373, solicitation to commit a
23 crime of violence; 18 U.S.C. § 372, conspiracy to impede or injure an officer; 18 U.S.C.
24 § 249, hate crimes; 18 U.S.C. § 231, teaching or demonstrating the use of a firearm or
25 explosive with intent that the teaching be unlawfully used for a civil disorder; and 18
26 U.S.C. § 875, threats communicated in interstate commerce.

27 //

Overview of Investigation

12. Kyle BENTON is a 28-year-old male, who resides in Snohomish, Washington, within the Western District of Washington, who has used various internet-based services, including Telegram, to post and share content indicating BENTON has committed the above identified Target Offenses.

13. BENTON is a 28-year-old male who joined the U.S. Army in 2017, serving as an infantryman. Following incidents of domestic violence in November 2019 and May 2020 and an attempted suicide, BENTON was Other Than Honorably Discharged from the Army in June 2020. He moved to Arlington, Washington, and resided there until April 2022, when he relocated to Astoria, Oregon. BENTON has no known criminal convictions.

14. Based on my review of United States Army records, I know that in November 2019, BENTON was arrested by the Army Criminal Investigative Division (CID) for domestic violence, assault, and strangulation of his then-spouse. In February 2020, the Army CID of Fort Drum began investigating BENTON for the operation of several online social media accounts that contained anti-Semitic and neo-Nazi propaganda and related violent extremist content. These online accounts included the monikers "Liftwaffle," "Kiloblunton," "BasedKilo," "Timothy James McVeigh," and others. Based on my training and experience, I am aware that Timothy McVeigh served in the U.S. Army before committing the bombing of the Alfred P. Murrah Federal Building in Oklahoma City in 1995; the Luftwaffe was the aerial warfare branch of Nazi Germany during World War II; and "Liftwaffle" is a play on the name Liftwaffe or Luftwaffe and is both a white supremacist weightlifting group and a podcast hosted by known white supremacist David Duke. The FBI has not received the disposition from the military, but investigators have reviewed BENTON's criminal history, which indicates that the disposition in May 2020 was an administrative separation from the military and a

1 bar to reenlistment. BENTON received an Other Than Honorable Discharge in June
2 2020.

3 15. From my review of Army records, I further know that in May 2020,
4 military authorities responded to BENTON's residence for a domestic violence incident
5 against his then-spouse as well as a suicide attempt by BENTON.

6 16. Also in May 2020, the FBI served a search warrant on Facebook (now
7 Meta) and reviewed historical account information, including the contents of Instagram
8 instant messaging services. That information showed that during September 2019,
9 BENTON communicated over Instagram using user ID "Überdimensioniert
10 Nasensucher" (UID 100001670151810) with Isaiah Thomas Fowlkes, who was using the
11 account name "Viktor Baranov" (UID 100005905118148), about killing a homeless
12 person in New York City based on that person's sexual orientation. Specifically,
13 BENTON, under the aforementioned moniker, wrote to Fowlkes that he should "kill a
14 homeless man and see how you feel." When Fowlkes asked for BENTON's help,
15 BENTON agreed, saying "Yeah. Of course. All we need is our getup and gloves. A hotel.
16 Some money. An alibi." BENTON explained that the plan was to "walk around a back
17 alley" and to "find some scum." BENTON suggested Greenwich Village because "it's a
18 hot spot for homosexuals." Regarding a suitable alibi, BENTON explained, "Let's say we
19 get cut, some how our blood ends up at the scene. Plan is we call the police immediately
20 after and say we were taking a short cut and a homeless guy attacked." They discussed
21 the need for a change of clothes, including gloves, Gore-Tex, and masks, to which
22 BENTON noted that "new masks and gloves are not cheap." They discussed the need to
23 ensure their weapons were legally possessed in New York City and discussed knives,
24 with BENTON commenting that two-inch knives were "enough to kill" and they cannot
25 or should not carry "assisted open" or "fixed" knives. Fowlkes told BENTON that if, he
26 (Fowlkes) wore Doc Marten boots, and that this could earn them their "red laces."
27

1 BENTON responded, “tru.” At this same time, Fowlkes bought gloves, a jacket, and
2 several pairs of combat boots through Amazon.

3 17. Based on my training and experience, I am aware that Doc Marten boots
4 are popular among white supremacist extremists, who also commonly use red- or white-
5 colored shoelaces in their boots to identify themselves as white power skinheads, and that
6 white or red laces must be “earned” by committing a racially motivated crime of
7 violence.

8 18. On July 31, 2020, Army CID interviewed Fowlkes. Fowlkes identified the
9 account “Überdimensioniert Nasensucher” as being BENTON’s. Fowlkes stated that
10 BENTON was a member of several extremist groups and actively recruited soldiers to
11 join those groups. One of these groups was the O9A. Fowlkes stated that BENTON saw
12 their role as uniting various white supremacist and alt-right groups. Fowlkes stated that
13 nothing ever came of the plan to murder a homeless person and that Fowlkes never
14 intended or desired to conduct an attack. The Army CID did not interview BENTON as
15 part of its investigation into Fowlkes, as BENTON had been discharged by this point.

16 19. In September and October 2020, Army CID and FBI investigators
17 interviewed several soldiers from BENTON’s unit at Fort Drum who Fowlkes had
18 identified as being part of Fowlkes’ and BENTON’s group, identified below as Soldier-1
19 (S1) and Soldier-2 (S2).³

20 20. S1 reported that BENTON said that he owned a Colt 1911 pistol and AR-
21 15 rifle at his residence.

22 21. S2 said that BENTON expressed his admiration for mass murderers,
23 including Ted Kaczynski and Brenton Tarrant. S2 said BENTON reported he had read
24 the manifestos of Kaczynski and Tarrant. S2 also said BENTON may have had plans to
25 shoot up an unknown synagogue or mosque. S2 also said that BENTON stated that he

26
27 ³ The identities of these interviewees are known to me and have been anonymized here for the safety of the
interviewees in the event that this affidavit is unsealed.

1 wanted to be the next Ted Kaczynski. In response to Ted Kaczynski dying on June 10,
 2 2023, BENTON shared a photograph of Kaczynski which read, “Rest in Peace Theodore
 3 Kaczynski” as a story on one of his previous Instagram accounts. Based on my training
 4 and experience, I know that Ted Kaczynski, who was also known as the “Unabomber,”
 5 killed multiple people and injured many more in a nationwide bombing campaign in the
 6 1990s, and that his manifesto contains ideas admired by racially based violent extremists.

7 **Interview of Victim in Domestic Violence Case**

8 22. On October 25, 2021, FBI investigators interviewed the victim identified in
 9 Benton's domestic violence case (hereinafter “Adult Victim-1”). Adult Victim-1 told the
 10 FBI that BENTON associated himself with the Boogaloo movement, and throughout the
 11 May 2020 domestic violence incident was sporadically on Facetime with individuals
 12 Adult Victim-1 identified as his Boogaloo associates.⁴ She indicated BENTON said that
 13 he wanted to shoot up the “alphabet boys” or a local police station. Based on my training
 14 and experience, I know that the alphabet boys refer to people that work for law
 15 enforcement, typically an agency with an acronym like the FBI, DEA, or ATF.

16 23. Adult Victim-1 told the FBI that BENTON used Instagram and Telegram to
 17 communicate with the Boogaloo group and other white supremacists. Between 2017 and
 18 2020, BENTON both bought and sold a variety of tactical gear and weaponry, including
 19 body armor vests and plates, bullet-resistant helmets, firearms holsters, firearm
 20 attachments, combat knives and magazine pouches. Using this gear, BENTON assembled
 21 his own military-style kit (i.e., all the gear a soldier carries) and trained regularly with it.

22
 23 ⁴ Based on my training and experience, I know that some domestic violent extremists (DVEs) use the
 24 “boogaloo” concept to reference a violent uprising or impending civil war. The concept has resonated with militia
 25 violent extremists, who have adopted it to reference an impending politically-motivated civil war or uprising against
 26 the government following perceived incursions on Constitutional rights—including the Second Amendment—or
 27 other perceived government overreach. Some racially or ethnically motivated violent extremists (RMVEs) have used
 the term to reference an impending race war—or other conflict that will lead to the collapse of the “system,”
 including the US government, society, etc. DVEs may allude to the boogaloo concept by using shorthand terms such
 as “big igloo” or “big luau” and imagery such as igloos or Hawaiian shirts. The boogaloo is not a single cohesive
 group, but rather a loose concept arising from internet platforms which has become a rallying point for some violent
 extremists.

1 The kit included ballistic plates. According to Adult Victim-1, BENTON's purpose in this
2 was for “potential preparation for future actions.” She said while serving as the company
3 armorer at Fort Drum, BENTON often came home with random bullets and gun parts,
4 and it was important to BENTON to maintain his access to the armory. BENTON made
5 Adult Victim-1 join him in packing and repacking rucksacks with survival supplies on a
6 regular basis in case “someone came knocking.” The rucksacks were filled with
7 homemade military gear, extra clothing, food and an excessive number of tourniquets.

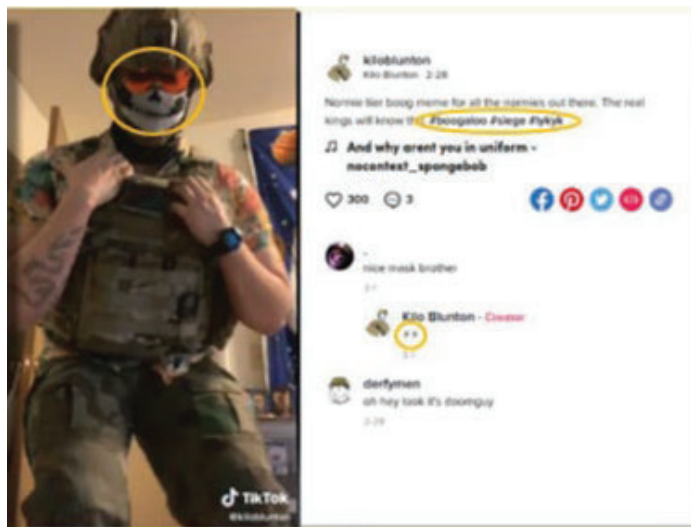
8 24. Adult Victim-1 also said BENTON used various social media accounts to
9 communicate with others. She said BENTON used various names and naming
10 conventions when creating social media accounts. She indicated that he used his name
11 initially as an account name, but that he eventually adopted the account name “Kilo
12 Blunton,” which is a play on his name, Kyle Benton. Adult Victim-1 also said he adopted
13 other monikers and account names. BENTON is linked to a Snapchat account with a user
14 account name of “Kilo Blunton” through Adult Victim-1’s statements but also because
15 the Snapchat user account “Kilo Blunton” is associated with telephone number 315-921-
16 5180. Based on legal process returns from AT&T, BENTON is the subscriber of 315-
17 921-5180. Additionally, investigators have seen a selfie-style photograph posted on the
18 “Kilo Blunton” Snapchat account showing BENTON holding a rifle.

19 **BENTON’s Posts from Social Media Accounts**

20 25. Many social media accounts associated with BENTON have been
21 accessible to the public and reviewed by the FBI. These include: a public Telegram
22 channel entitled “liftwaffle;” a TikTok account “kiloblunton;” a Twitter account
23 @Liftwaffle_; an Instagram account “liftwaffle.v20;” and an Instagram account
24 “kiloblunton.” These accounts were initially identified through the investigation
25 conducted by United States Army Criminal Investigation Division (“CID”). The United
26 States Army CID investigation established BENTON was the user of these accounts. This
27 was later confirmed by the FBI through subscriber information obtained for various

accounts and open-source research. In addition, other open-source information led the FBI to discover additional private and public social media accounts linked to BENTON through his phone number, including accounts on Telegram, Facebook, Instagram, Vine, and TikTok. In many of the public posts, BENTON displayed accelerationist iconography and ideology, particularly which was associated with the Boogaloo movement.

26. For example, on February 28, 2020, BENTON posted on his TikTok profile under moniker “kiloblunton” a photo, pasted below, in which he displays several references to Boogaloo ideology.



27. The above posting reads: “Normie tier boog meme for all of the normies out there. The real kings will know.” Based on what I have learned through my investigation, I believe the person in the photograph above is BENTON. BENTON appears to be wearing a shirt with a Hawaiian print. Based on my training and experience, I know that that print has been used by Boogaloo adherents as a reference to the boogaloo. The posting references the hashtags “#boogaloo” and “#siege.” Based on my training and experience, I know that the “siege” is a reference to an anthology of violent essays authored by American neo-Nazi James Mason in the 1980s in which he advocates for decentralized violence to bring about a race war, and that the essays are

1 considered a seminal guide in neo-Nazi, accelerationist ideology. BENTON responds to a
2 comment to his post with the sig rune (or Siegrune), which based on my training and
3 experience, I know that symbol references victory (sieg) and was adopted by Nazi
4 Germany's Schutzstaffel or "SS." BENTON appears to be wearing a Punisher-style skull
5 mask, which based on my training and experience, I know was adopted by Atomwaffen
6 Division (AWD)⁵ and is now used by various accelerationist groups. I further know this
7 style mask is often referred to as a Siege-mask in reference to James Mason. Finally, in
8 the posting BENTON is wearing Pit Viper-style sunglasses that have an orange reflective
9 tint, which I know based on my training and experience to have been adopted by neo-
10 Nazi accelerationists.⁶

11 28. Other content on BENTON's accounts have historically contained pro-Nazi
12 symbology and advocated for violence, some of which was posted publicly.

13 29. On July 11, 2020, BENTON posted on his known Telegram profile under
14 the moniker @LiftWaffle a video encouraging his followers to "murder your local rabbi."

15 30. On October 16, 2020, BENTON posted on his known TikTok profile under
16 moniker @kiloBlunton saying, "Fuck the fucking Jews, I hope they all burn to death."

17 31. On November 20, 2020, BENTON posted on Telegram under the moniker
18 @liftwaffle a picture of a modification of the "Doug Flag," a popular flag common to the
19 Cascadia region, placed behind a Sonnenrad Nazi symbol, along with a caption saying in
20 part that ". . .Cascadia is birthright of the white race, and that sexual degenerates,
21 negroids, mongroids, and a origin our [sic] aren't welcome here any longer. Though they
22

23 ⁵ Based on my training and experience, I know that the Atomwaffen Division (AWD) is a US-based racially
24 or ethnically motivated violent extremist (RMVE) group with cells in multiple states. The group's targets have
25 included racial minorities, the Jewish community, the LGBTQ community, the US Government, journalists, and
critical infrastructure. AWD reportedly has international ties and some members have traveled abroad, likely to meet
with like-minded individuals.

26 ⁶ Based on my training, experience, and this investigation, I know that "to accelerate" or believe in
27 accelerationism, refers to a white supremacist belief that the current system is irreparable and without an apparent
political solution, and therefore violent action is necessary to precipitate societal and government collapse and start a
race war.

1 may continue to hide in their metropolitan sanctuaries, the day is coming when they will
2 leave or they will hang.” The same day the same account posted a picture of the
3 Sonnenrad Nazi symbol behind an individual in a skeleton mask holding a semi-
4 automatic weapon with the caption “Vote from the rooftops. That’s the only way voting
5 will remove them.”

6 32. On May 15, 2022, the day of the Tops supermarket shooting in Buffalo,
7 New York, where a white gunman killed ten African Americans in a racially motivated
8 shooting, BENTON wrote a private Instagram message on account 4290, obtained as part
9 of a search warrant, which noted, “Today has been another glorious entry into the annals
10 of Aryan Terror. The harder the jew system presses back, the more the Aryan Will shall
11 be unleashed to wreak havoc and death upon the hordes of our racial and spiritual
12 adversaries. Welcome the coming pressure with the knowledge that these occurrences
13 will only become more frequent, violent, and effective. Hail the Bloodshed Hail Hatred
14 Hail the Everlasting spirit of Adolf Hitler.”

15 **Investigators Interview BENTON After His Failed Attempt to Purchase a**
16 **Firearm**

17 33. In November 2020, BENTON attempted to purchase a Harrington and
18 Richardson M1 rifle at North Coast Shooters Supply in Warrenton, Oregon. When
19 completing the paperwork for ATF Form 4473, BENTON checked a selection box “no”
20 that he had not “ever been adjudicated as a mental defective” or “ever been committed to
21 a mental institution.” Because BENTON’s criminal background check reflected the
22 incident from May 2020 wherein BENTON was hospitalized, the Oregon State Police
23 denied BENTON’s request to purchase the firearm due to the disparity between
24 BENTON’s response on the ATF form and his background. According to a database
25 check conducted on August 29, 2024, BENTON has not sought to lawfully purchase a
26 firearm since that time in the State of Washington.
27

1 34. On April 1, 2021, FBI investigators interviewed BENTON after his
2 unsuccessful attempt purchase a firearm in Oregon. Due to the ongoing nature of the
3 investigation, investigators did not directly confront BENTON with specific violent
4 rhetoric contained in his social media accounts. Rather, BENTON was approached
5 regarding his denial of a firearm by Oregon State Police. Interviewers explained to
6 BENTON that the reason he was denied purchase was due to an answer he had marked
7 on ATF Form 4473 regarding mental health. BENTON stated that the question was not
8 clear, and believed his answer should have been “no” because he was never admitted to a
9 hospital for long-term care. He stated that he believed the charges related to domestic
10 violence were dismissed. He said that he attempted to commit suicide and was admitted
11 to a civilian hospital in New York and was only there for a few days.

12 35. During the interview, BENTON stated that he did not hate non-whites or
13 communists and that he “just wanted to do his own thing.” He said he preferred the term
14 National Socialist rather than being labeled as a Nazi and that if he had the opportunity to
15 live his life it would be more of a Waco, TX or Ruby Ridge environment so he can be left
16 alone, and that if people don’t like him, he should just be left alone. BENTON also stated
17 that he made a TikTok video⁷ regarding Dylann Roof, which he said was intended as a
18 joke, and that he has re-enacted German battle scenes and has bought numerous Nazi
19 paraphernalia for his outfit.

20 36. Based on my training and experience, I know that Waco, TX was the site of
21 a law enforcement siege of the compound that belonged to the religious sect of Branch
22 Davidians and that Ruby Ridge is the site of an incident in which FBI agents and U.S.
23 Marshals engaged in an 11-day standoff with self-proclaimed white separatist Randy
24 Weaver, his family, and a friend in an isolated cabin in Boundary County, Idaho. I know
25
26

27 ⁷ The FBI has not been able to locate the TikTok video referenced by BENTON.

1 Dylann Roof is white supremacist and Neo-Nazi associated American who shot and
2 killed nine African Americans at a church in Charleston, South Carolina, in 2015.

3 37. During the April 2021 interview, BENTON stated that he did not currently
4 belong to any white supremacist group and had no interest in doing so, nor had he in the
5 past. He stated that he did not know anyone associated with any white supremacist or
6 extremist group but that if he did, he would stay away from them. He did say that his
7 girlfriend had contacted a former white supremacist and Hammerskins member who had
8 written a book about his time as a white supremacist and Hammerskins member, and that
9 BENTON spoke with him. I know that Hammerskins are a white supremacist group
10 founded in the 1980s in Dallas, Texas. Hammerskins have a significant history of
11 violence committed primarily against minorities.

12 38. The Army CID's investigation also showed that BENTON interacted online
13 with extremist groups and white supremacist ideologies including AWD, Legion of Saint
14 Ambrose, and the former Traditionalists Party.

15 **FBI Online Covert Employees and a Confidential Human Source**
16 **Communicate with BENTON**

17 39. Based on discussions between a confidential human source (CHS-1)⁸ and
18 BENTON, CHS-1 reported that BENTON associates himself with the Boogaloo
19 movement. In November 2021, BENTON told CHS-1 that he was in support of the Butler
20 Plan. According to CHS-1, BENTON saw himself as a leader and unifier of white
21 supremacist and alt-right groups and wanted to recruit more individuals into his group.
22 Based on my training and experience, I know that the Butler Plan is a goal that seeks the
23 creation of a white ethno-state in the Pacific Northwest, also known as the Northwest
24 Territorial Imperative. The ideology is a main tenet of several extremist movements,
25 including The Base, which, based on my training and experience, I know is a U.S.-based

26 ⁸ CHS-1's handling agent stated that CHS-1 is motivated by a desire to assist law enforcement and to prevent
27 violence, does not have a criminal record, and has previously provided corroborated information. CHS-1 is not
receiving benefits in exchange for his/her information.

1 racially or ethnically motivated violent extremist (RMVE) group with cells in the United
2 States and reported ties abroad. The Base encourages the hastening of a race war and
3 aims to establish a white ethno-state through violence against non-white minority groups
4 and the US Government.

5 40. Based on subpoena returns from CashApp, on November 21, 2021,
6 BENTON sent his significant other B.H. \$400 with the memo note "gun." As discussed
7 above, BENTON had previously sought to purchase a firearm in Oregon and was denied
8 by the Oregon State Police. The Oregon State Police does not have a record of a firearms
9 purchase by BENTON's significant other.

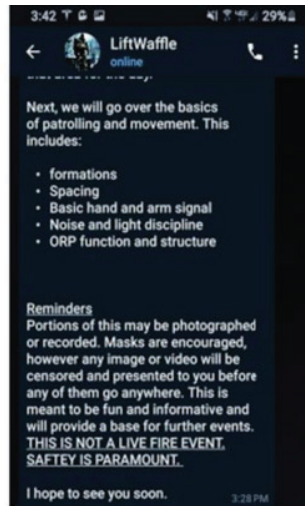
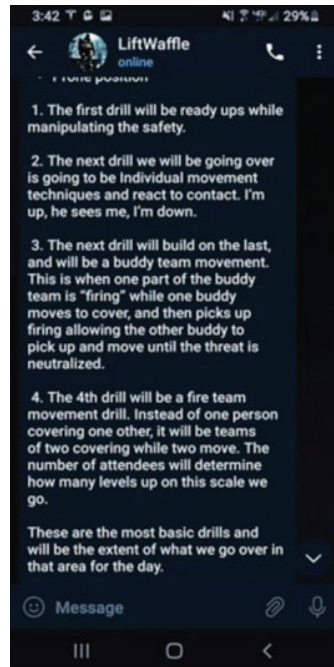
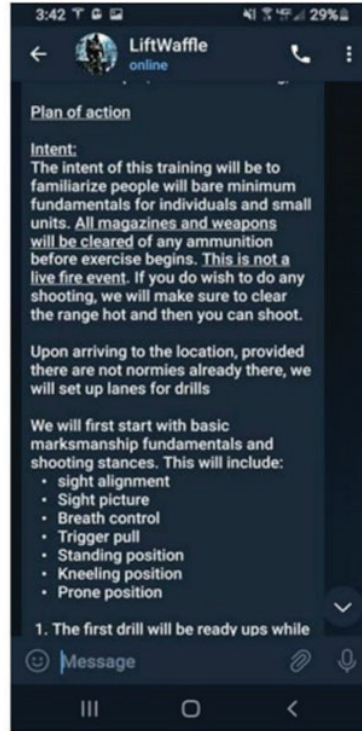
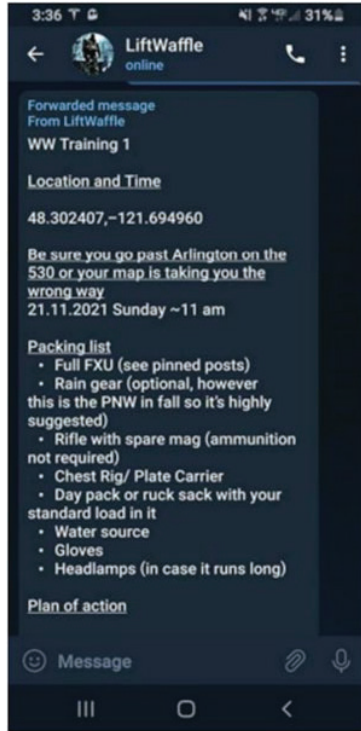
10 **BENTON's Involvement in Trainings**

11 41. On November 21, 2021, BENTON hosted a weapons training group for
12 participants of his private Telegram channel Liftwaffle's Secret Bunker, of which CHS-1
13 was a member and who reported the following. BENTON posted a training plan in the
14 channel with the stated agenda of training "bare fundamentals for individuals and small
15 units" regarding marksmanship, movement techniques, reaction to contact, buddy team
16 movement and shooting and patrolling. BENTON's stated goal was to go over "the most
17 basic drills" and to "provide a base for further events." BENTON posted the date and
18 GPS location of the training event in the channel. He encouraged the donning of masks
19 for the event, as shown below.

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42. FBI Seattle believes that up to eleven individuals attended the training identified above. The identities of the individuals who attended are unconfirmed by the FBI at this time. Several photos were posted the day after the training in the same Telegram channel. These were provided by CHS-1, as shown below.



43. The photos above depict two individuals. I believe the individual on the left to be BENTON based on the military style gear and build of the individual being consistent with what is known about the type of gear BENTON owned and his build at the time the photograph was taken. The figure believed to be BENTON has a raised hand in what appears to be a Hitler salute while the second figure is holding a green, white, and blue flag with the Wolfsangle symbol. BENTON was observed the day prior to this training loading a flag with the same characteristics as this flag into his truck before departing. Based on my training and experience, I know that these colors are the colors commonly associated with the Pacific Northwest and are represented in the unofficial flag of the region known as the Doug Flag, bearing the Wolfsangle symbol which was utilized by Nazi Germany's Waffen SS units.



44. The photo pasted above shows a group of persons with the aforementioned flag as well as the Black Sun flag, or a black flag depicting a sonnenrad (sun wheel) symbol. I know from my training and experience that this symbol was appropriated by Nazi Germany in their attempt to invent an idealized "Aryan/Norse" heritage. The sonnenrad was the inspiration for the swastika.

45. In July 2022, BENTON told an online undercover FBI agent (UCE) that the skinheads he used to associate with told him that his trainings "were too militant and got mad that we were training."

46. In September 2022, the FBI and Oregon State Police interviewed one of BENTON's family members, regarding Benton's recent behavior. The family member told investigators that BENTON regularly spoke about how Jews and Black people needed to be killed. The family member was aware that BENTON and his friends went to train together in the woods often and that there was a similar event scheduled for October

31, 2022. When the family member asked BENTON what they were training for, BENTON made references to “something planned” and that “something big is coming.”

Identification of Garmr Account

47. In May of 2022, investigators learned about a Telegram account with the screen name of Garmr (“Garmr”), which has now been associated with BENTON through numerous interactions with various FBI CHSs and FBI OCEs. In particular, Garmr is associated with BENTON through various means including (1) Garmr shared a photograph showing BENTON in his Army uniform with the statement “me at local MSD larping as NATO” and this same photograph is currently posted on BENTON’s publicly accessible Facebook account; (2) Garmr posted a photograph of an F-350 Ford truck with the statement “slapped a canopy on that bitch” and electronic surveillance by investigators established the F-350 associated with BENTON showed a bed cover or canopy had been affixed to it, which did not have a bed cover/canopy previously; and (3) Garmr posted about getting a gift for his brother and shared a video, a screenshot of which, investigators have viewed, and the screenshot of the video posted by Garmr showed the name Keith Benton on the package along with an address in Astoria, Oregon. I know from my investigation that BENTON has a brother named Keith Benton and the address on the parcel shown in the video shared by Garmr is BENTON’s mother’s address.

Use of Number 14

48. In July 2022, Garmr sent an OCE a photo in which he posed with an AR-15 style rifle with the numeral “14” painted on the magazine well in white lettering. This is displayed below.



49. Based on my training and experience, I am aware that the numeral “14” is a reference to the fourteen words slogan: “We must secure the existence of our people and a future for white children.” The slogan originated with David Eden Lane, one of the founding members of the now-defunct white separatist insurrectionist group The Order. It is now one of several primary symbols of white supremacist movements. This symbol has also been used by racially motivated mass shooters. Both Brenton Tarrant, the Christchurch, New Zealand mass shooter, and Payton Gendron, the Buffalo, New York mass shooter who killed 10 Black people, had this numeral painted on the firearms used in their shootings.

BENTON’s Connection to Terrorgram

50. The FBI believes that BENTON appeared in “Hard Reset: a Terrorgram Publication,” the fourth digital magazine authored by the Terrorgram Collective, more commonly known as Terrorgram. “Hard Reset” is Terrorgram’s fourth publication and was released on various Telegram channels and accounts in July 2022. The publication specifically promotes targeting of politicians, chief executive officers of technology companies, minority groups, and government employees. Of the publication’s 261 pages, 25 pages are dedicated to detailed descriptions of tactics, techniques, and procedures.

1 Additionally, 50 pages are dedicated to detailing which targets are best for attacks –
2 specifically critical infrastructure (47) such as train tracks, LGBTQ+ (11), law
3 enforcement (8), and abortion provision (7). There are pages that carry a call to action or
4 endorsement of terrorist violence and pages that are dedicated to explanatory narratives,
5 which is typically white supremacist accelerationism.

6 51. Page 150 of Hard Reset depicts two photographs of an individual in
7 camouflage, wearing a mask, and holding a rifle. This is shown below. A close-up of the
8 left-hand photograph shows an arm patch on the figure's left arm; the numeral 14 painted
9 on the rifle's magazine well; and a skull facemask. This is shown in the image pasted
10 below.



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20 52. The numeral 14 on the magazine well and the skull facemask are similar to
21 the mask and lettering previously discussed above. Other physical attributes of the
22 weapon are similar to those depicted above. A “14” is also shown in a post from
23 Instagram user “Skinwalkerxiv” from August 9, 2022, seen below at the right.



53. Based on legal process from Meta Platforms, BENTON is the subscriber of Instagram account “sk1n_walker.” The “sk1n_walker” account has been linked to other social media accounts known to be operated by BENTON through various means such as machine cookies, telephone number, email, IP addresses, creator, admin and/or naming convention. Other social media accounts are registered in BENTON’s name or are linked to email addresses or telephone numbers known to be associated with BENTON.

54. Additionally, several posts from this same account show the user in possession of camouflage displaying a patch identical to that shown above, which bears the green, white, and blue flag with the Wolfsangle symbol. One such post was published by BENTON on May 20, 2022, and is shown below.



1 55. In August of 2023, United States Magistrate Judge Youlee Yim You from
2 the District of Oregon approved a search warrant under case number 3:23-mc-00753 A-B
3 for the following Meta accounts associated with BENTON, namely Facebook account
4 100094912476103 (hereinafter “6103”) and Instagram accounts 57998401405
5 (hereinafter “1405”), 50655290041 (hereinafter “0041”) and 50089434290 (hereinafter
6 “4290”).

7 56. Meta returns for Instagram account 1405 revealed an Archived Story in
8 which BENTON has a copy of Hard Reset opened to page 150. The photo is captioned
9 with “We do a little light reading.” The Archived Story is shown below.



22 57. On October 15, 2022, Terrorgram released a documentary video titled
23 “White Terror: A Terrorgram Documentary,” which chronicled attacks carried out by
24 every “Saint” from April 1968 to May 2022. Based on my training and experience, I
25 know that “saints” is a reference to mass shooters that become idolized and labeled as
26 “saints”, and that there are five criteria required to become a “saint”: being of white race;
27

1 having motive to kill those who threaten the white race; sharing the worldview of white
2 supremacy; conducting a deliberate attack; and killing at least one person in said attack.

3 58. “White Terror” was dedicated to Juraj Krajcik, a racially motivated mass
4 shooter who killed two people at a LGBTQ+ coffeeshop on October 12, 2022, in
5 Bratislava, Slovakia in support of his white supremacist ideology. In his online
6 manifesto, Krajcik cited Terrorgram as inspiration for his ideology. In the release of
7 “White Terror”, Terrorgram identified Krajcik as Terrorgram’s first saint. According to
8 the FBI’s OCE, BENTON forwarded “White Terror” to his private Telegram channel
9 Garmr’s Secret Bunker.

10 59. The above provides background on BENTON and demonstrates his history
11 of possessing firearms for extended periods of time and demonstrates his ongoing activity
12 dating back numerous years.

13 **Identification of FIREARM ONE**

14 60. In February of 2023, United States Magistrate Judge Jeffrey Armistead
15 from the District of Oregon authorized a search warrant under case number 23-112 for
16 two Instagram accounts associated with BENTON, specifically identified as Instagram
17 account 50655290041 (hereinafter “account 0041” or “0041”) and Instagram account
18 50089434290 (hereinafter “account 4290” or “4290”).

19 61. Both accounts 0041 and 4290 are attributed to BENTON though subscriber
20 information provided by Meta, the parent company of Instagram, as a result of legal
21 process which was served October 25, 2022. Meta records indicate BENTON is the
22 identified subscriber for both accounts 0041 and 4290. In addition, investigators have
23 seen BENTON-related images and BENTON-related content posted on both accounts,
24 including photographs of BENTON; BENTON with children, who appear, from open-
25 source research, to be his children; and BENTON’s significant other, who is known to
26 investigators.
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62. Returns from accounts 0041 and 4290 revealed evidence which indicated that BENTON was in possession of a short-barrel rifle (SBR) and machinegun (“FIREARM ONE”).

63. On February 28, 2022, account 4290 wrote to User-1⁹ in a private message “My EDC is a 10.5 AR lmao” immediately followed by a photograph, which is pasted below.



64. I know from my training and experience and from conversations with other investigators “EDC” stands for “everyday carry,” which is a reference to the firearm most commonly used by an owner or possessor of the firearm; that “10.5” refers to a rifle barrel length in inches; that “AR” is a reference to a firearm manufacturer named ArmaLite; and “lmao” is an acronym for “laugh/laughing my ass off.” Based on my training and experience, I believe the above identified private message effectively translates to “My everyday carry is a 10 and one-half inch ArmaLite rifle.” Pursuant to the National Firearms Act (NFA), a shoulder-fired rifle firearm with a barrel length of less than 16 inches constitutes a short-barreled rifle.

⁹ The identities of Users-1 through -9, are known to me. They have been anonymized here for their privacy in the event this affidavit is unsealed.

65. Meta returns further revealed that on March 8, 2022, account 0041 wrote to User-2 via private message in a conversation regarding protests over firearms magazine bans, "If you take me I'll show up with a full auto short barrel rifle with a 30 round mag just to say fuck you" followed by the same photo above of a SBR. Account 0041 continued, "Show up and I hope they try to arrest me for violations the NFA."¹⁰ On March 9, 2022, account 4290 wrote to User-3 via private message, "Getting your hands on a full auto is actually very easy. And I've heard can be cheaper than buying a normal gun, not that I would know."

66. On March 23, 2022, account 4290 wrote to User-4 via private message, "I have a KAC RIS/RAS coming for my 10.5. Which I have made sure not to openly post anywhere." Following this message, the same photograph of a firearm as contained in paragraph 11 above and previously sent from account 0041. From my training and experience with firearms I believe the photograph shows a SBR because the barrel length appears to match the length of 10.5 inches as stated by account 4290 especially when compared to the length of other rifles.

67. I know from my training and experience "KAC RIS RAS" refers to a rail interface system, or rail adaptor system, manufactured by Knights Armament. Both systems allow for the attachment of accessories to firearms.

68. On July 19, 2022, account 0041 wrote to User-5 via private message, "If you have the skill you can build a short barreled rifle in your garage and no one can stop you lmao." In a later message in the same exchange, account 0041 wrote in response to a comment about possessing a license, "I have carried for years without one lol. But I understand the concern." Account 0041 then sent the following photograph, pasted below, to User-5 with the comment "I also make my own."

¹⁰ The National Firearms Act (NFA) is a comprehensive taxing scheme that regulates the manufacture, sale, and transfer of certain firearms and mandates the registration of those firearms.



69. On July 28, 2022, account 4290 wrote to User-6 via private message, “Wait till they find out about the shit that wasn’t captured in film hahahaha,” and on July 29, 2022, “I keep that 10.5 for a just in case. I plan on using the 16 inch until I get my hands on a 20 inch.”

70. On August 17, 2022, account 4290 wrote to User-3 via private message “I also build AR pistols with a stock.”

71. On August 19, 2022, account 4290 wrote to User-7 via private message, “I have all kinds of gun that I larp with but my painted AR is my serious business gun. I don’t currently have an AK but I’d like to. I have a friend who makes them. He’s gonna get around to making me one and I’m trading him a K98 for it. His house is just boxes of surplus parts, machines, and guns.”

72. I know from my training and experience that “Larp” refers to live action role play, a type of interactive role-playing game in which the participants portray characters through physical action, often in costume and with props. I also know “K98”

1 refers to a Karabiner 98 kurz, a service rifle used by the German Wehrmacht during
2 World War II.

3 73. On September 4, 2022, account 0041 had the following exchange with
4 User-8:

- 5 • 0041: Do cops have to pay tax stamps
- 6 • User-8: Yup just like everybody else
- 7 • 0041: Why does the ATF enforce tax codes
- 8 • User-8: No clue man
- 9 • 0041: Does the penalty for NFA items stack or is a violation just a
10 violation
- 11 • User-8: What do you mean stack?
- 12 • 0041: Let's say you have a not stamp tax SBR, does it double the
13 time and fine if it's also a post 86 machine gun. Or is it all just one
14 NFA thing
- 15 • User-8: No idea, I can tell you that the code for the nfa laws read
16 that 'any crime committed in possession of a title 2 item'. That's
17 more a lawyer question.

18 74. I know from my training and experience that "ATF" refers to the Bureau of
19 Alcohol, Tobacco, Firearms, and Explosives, which is a federal law enforcement agency
20 which investigates offenses of the NFA; that "SBR" is an acronym for short-barreled
21 rifle; and that "post 86 machine gun" refers to machineguns imported or manufactured on
22 or after May 11, 1986.

23 75. On January 15, 2023, account 0041 wrote a comment on a post by User-9,
24 writing, "Normalize building illegal SBR Machineguns in your garage and posting them
25 on social media and waiting for the feds to show up."
26
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1 76. On January 18, 2023, account 0041 wrote to User-3 via private message
2 “People pay an extra tax for a short gun? Nah man we just do it and don’t tell the feds
3 lol”.

4 **“Kilo Blunton” Snapchat Account Shows FIREARM ONE as a
Machinegun**

5 77. On June 26, 2023, CHS-3¹¹ observed that Snapchat user “Kilo Blunton,”
6 posted a video in the group “internet racism PRIVATE.” The video shows an unidentified
7 individual (UI), believed to be a trusted associate of BENTON, shooting a short-barreled
8 M16-style SBR (“FIREARM ONE”) in fully automatic mode at an outdoor range. What
9 appears to be FIREARM ONE appears in multiple social media accounts associated with
10 BENTON including the Snapchat account “Kilo Blunton,” account 0041, and account
11 4290. In many of these instances it is implied and/or directly stated that the user of these
12 accounts is the owner of the firearm. BENTON and the UI are believed to be friends as
13 BENTON referred to UI as a friend in a social media comment. BENTON also trusted
14 the UI with the handling and utilization of the illegal firearm and the UI trusted
15 BENTON to retain the footage of the illegal activity occurring. The video shows the rifle
16 had a short barrel, fixed front sight base, detachable M16-style carry handle, plastic
17 carbine clamshell-style hand-guards, and collapsible stock with distinctive OD green duct
18 tape, firing in fully-automatic function (i.e. firing multiple rounds with a single pull of the
19 trigger), thereby making it a machinegun under federal law. A screenshot from the video
20 showing the firearm firing as a machinegun posted on the “Kilo Blunton” account is
21 pasted below.

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26 ¹¹ CHS-3’s handling agent stated that CHS-3 is motivated by a desire to assist law enforcement and to prevent
27 violence, has no convictions, and has previously provided corroborated information. CHS-3 received benefits likely
including financial benefits in exchange for her/his/their information.

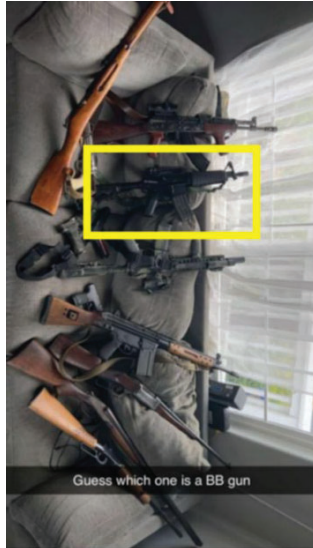


78. CHS-3 recognized the firearm posted by Snapchat user “Kilo Blunton” on June 26, 2023, FIREARM ONE, as appearing to be the same firearm that user “Kilo Blunton” had shared in a post in the same Snapchat group the previous year, which is pasted below.

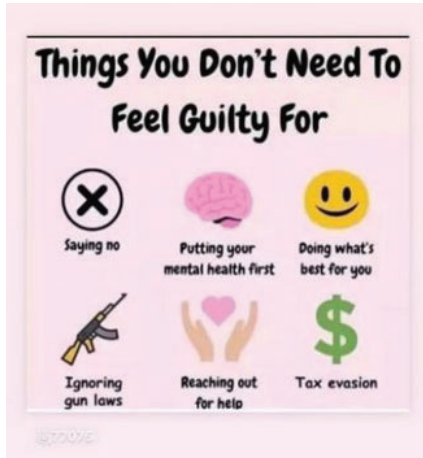


1 79. I know, based on my training and experience, that certain firearms required
2 to be registered under the NFA, including short barrel rifles and machineguns, are
3 registered with the Bureau of Alcohol, Tobacco, Firearms and Explosives. FBI Portland
4 contacted ATF SA Bogomil who caused a query of the National Firearms Registration
5 and Transfer Record (NFRTR) for BENTON with his identifying information
6 (applications are verified by fingerprint). I know from an investigator's research
7 BENTON is not an individual with a registered firearm in the NFRTR. Upon FBI Seattle
8 receiving this case an additional query was requested through the ATF, which indicated
9 BENTON is not an individual with a registered firearm in the NFRTR. On September 3,
10 2024, FBI Seattle received the updated results of the query which again yielded the result
11 that BENTON is not an individual with a registered firearm in the NFRTR.

12 80. Returns from Meta from the August 2023 search warrant authorized by
13 United States Magistrate Judge Youlee Yim You from the District of Oregon revealed
14 images which appear to show FIREARM ONE, content focusing on laws and regulations
15 applied to firearms as well as anti-law enforcement ideology. A yellow box has been
16 added to the below pasted images to highlight what is believed to be FIREARM ONE.
17 FBI Seattle has determined based on timing and the setting of the left most photograph
18 that it was likely taken in BENTON's residence in Astoria, Oregon. This is believed to be
19 BENTON's former residence as he often shared various photographs of him and children
20 on the same couch with the same style window behind the couch, same style of curtains
21 with a white railing visible outside. The type of railing and window placement seen in the
22 photos is consistent with BENTON's Astoria, Oregon residence as viewed from the
23 street.



81. Accounts 1405 and 0041, also shared multiple stories which have direct references to the NFA. Pasted below are examples of some stories posted by these accounts.



82. Based on my training and experience and conversations with firearms experts, I know that there are two ways to convert a semi-automatic rifle into a rifle capable of fully automatic fire. The first method is to affix a full auto sear in the lower of a rifle (i.e. the lower portion of the frame of a rifle). The installation of a full auto sear can be identified by an external view of the rifle. Just above the center of the selector switch there will be a receiver pinhole which will be filled when a full auto sear is

1 installed. The second and more common conversion method involves the use of what is
2 known as a drop-in auto sear. Installation of a drop-in auto sear method does not require
3 the visible pinhole and cannot be identified from the rifle's external appearance as it sits
4 inside the rifle lower.

5 83. Based on analysis of photos of FIREARM ONE it does not appear that the
6 pinhole on the lower portion of the rifle is present. This indicates to me that a drop-in
7 auto sear was utilized to convert the rifle into a machinegun capable of fully automatic
8 firing capacity, and a machinegun under federal law. A photo showing the lower of
9 FIREARM ONE with no apparent pinhole above the selector switch is pasted below.



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22 84. I know based on my training and experience and from conversations with
23 other experienced investigators who investigate firearm offenses that obtaining short
24 barrel rifles, like FIREARM ONE, and accessories that can convert semi-automatic
25 firearms to fully automatic firearms, such as drop-in auto sears, are generally viewed as
26 valuable. I further know that when individuals obtain such items they are unlikely to part
27

1 with them if they do not have weapons with perceived similar or superior capabilities and
2 they instead are likely to retain these items.

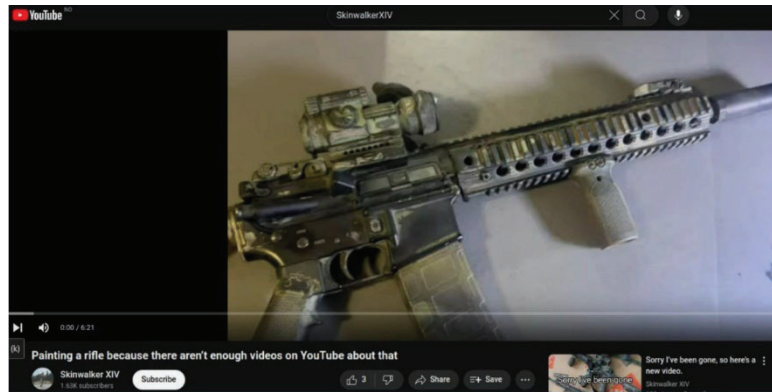
3 85. The possession of an unregistered drop-in auto sear (a machinegun as
4 defined under federal law) is prohibited by the NFA. BENTON has demonstrated he
5 tends to possess his firearms and firearm accessories for long periods of time and because
6 obtaining a device to convert a semi-automatic firearm to fully automatic, such as via a
7 drop-in auto sear, is generally viewed as a valuable commodity, based on my training and
8 experience, and conversations with other experienced investigators, I believe BENTON
9 still possesses the device used to convert FIREARM ONE to fire as a fully automatic
10 machinegun. I further know that a drop-in auto sear can be removed from FIREARM
11 ONE and installed in other firearms to enable that firearm to possess automatic firing
12 capabilities.

13 86. I further know based on my investigation that BENTON places a very high
14 value on his firearms, firearms parts, and firearms accessories. He places a particularly
15 high value on possessing a short barrel rifle and the component parts which make it
16 operate in a fully auto capacity due to its firing capabilities. This would make it very
17 unlikely that BENTON would sell or give away this particular weapon or part without
18 retaining a weapon and/or part he would view as superior. These beliefs are based on
19 various interviews of individuals who have had personal relationships with BENTON and
20 interactions as BENTON has had with various FBI CHSs and online undercover FBI
21 Agents (OCE). I also believe based on my investigation that he would at all times keep
22 his firearms in his control, likely in a gun safe in his residence.

23 **Identification of FIREARM TWO**

24 87. In July of 2024, SA Matthew Morgan conducted an assessment of another
25 rifle ("FIREARM TWO"), which often appears on social media accounts associated with
26 BENTON.
27

88. A video posted to Skinwalkerxiv on March 20, 2024, titled “Painting a rifle because there aren’t enough videos on YouTube about that” highlights the AR style rifle showing BENTON, who is recognizable by his voice, which SA Morgan is familiar with through this investigation, painting the rifle. SA Morgan recognized BENTON’s voice in the video because SA Morgan has listened to BENTON speak in numerous videos he has posted online and live streaming events where the observer of the videos can see BENTON’s face as he speaks. In the video posted to Skinwalkerxiv on March 20, 2024, the AR style rifle has a few noticeable changes including a shorter rail system, shorter barrel, new stock and has the addition of Sound Mitigation Equipment (SME) at the end of the barrel, from when images of this rifle have been previously posted. Screenshots of FIRARM TWO posted on the Skinwalkerxiv YouTube account in March of 2024 are pasted below.



89. ATF Chief Firearms Enforcement Officer (FEO) for Field Response Branch-West reviewed documents provided by FBI Seattle and the ATF analyzing FIREARM TWO and concluded that the rifle “appeared to be a rifle with a barrel length less than 16 inches in length, a short-barreled rifle.” The ATF FEO included the caveat that if both the muzzle break and the shroud pieces of the SME were welded to the end of the barrel this additional length would be above 16 inches and therefore not a SBR. The ATF noted, “such welding of the Witt Machine & Tool Company SME Slimline would be counter to the intended design” and “if the device were welded together, it could not be disassembled and would likely be difficult to clean and keep serviceable.” Additionally, CHS-5¹² communicated directly with Witt Machine & Tool Company and was told that although it is possible to be welded, “...we do not have any permanent mounting instructions.” Based on my investigation and experience it is unlikely that BENTON would permanently affix anything to a firearm which could affect the firearms ability to properly function.

Surveillance at BENTON’s residence Apparently Detected

90. On July 3, 2024, a surveillance operation was conducted at the apartment complex containing the premises in Snohomish, WA, which was later searched pursuant to the warrant on September 6, 2024. During the surveillance operation on July 3, 2024, it appeared as if BENTON’s significant other identified a vehicle with the operation. An FBI OCE noted that Garmr stated the following in a small Telegram chat group, “Someone has been driving by my place in a black SUV taking pictures with a real ass camera so I’m gonna delete my account when I get home. Idk what’s up but just to be safe.” Garmr also wrote, “I don’t know who or what it is but to be safe, and not endanger others when I get home to my laptop I will delete my account for a while. I’ll reach out to

¹² CHS-5’s handling agent stated that CHS-5 is motivated by a desire to assist law enforcement and to prevent violence, does not have a criminal record, and has previously provided corroborated information. CHS-5 is receiving benefits including monetary benefits in exchange for his/her information.

1 someone when I'm back and get added back. Again, probably not Feds, but the chance
2 exists so I'm playing it safe.” These posts were made prior to BENTON returning to his
3 residence likely from his personal cell phone. The content of this Garmr posting, which
4 corresponds with observations of investigators in the field who saw actions by
5 BENTON’s significant other on this date consistent with her discovery of surveillance,
6 further establishes BENTON’s association with the Garmr account, which was
7 established above.

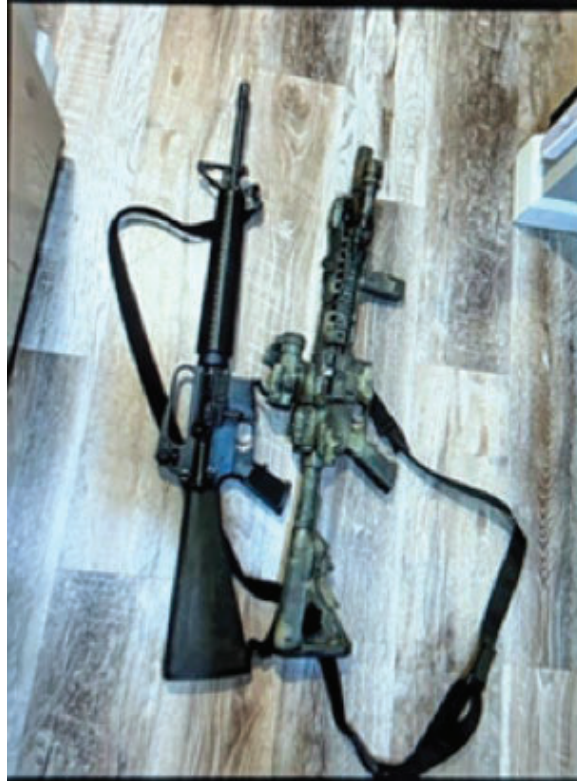
8 91. Agents monitoring BENTON’s social media accounts observed that some
9 social media accounts associated with BENTON, including the Garmr account, were
10 deleted after BENTON returned home on July 3, 2024. This leads me to conclude he
11 deleted these accounts while using a laptop computer, as he noted in communications set
12 forth above. Agents sent preservation letters for various accounts associated with
13 BENTON prior to the accounts being deleted.

14 **Post Detected Surveillance Activity**

15 92. Following the surveillance conducted on July 3, 2024, BENTON deleted
16 his Telegram which he had utilized to participate in Terrorgram related group chats. One
17 of these chats included a small group of the most influential members of Terrorgram
18 which generally has more than 30 participants.

19 93. In early August 2024 SA Morgan reviewed a new account with the
20 username @FARRIGHTAMERICAN, vanity name Free American Resistance Anti-State
21 (“Free American”) with the user ID 6638414905 was identified by an FBI OCE as an
22 account which likely belonged to BENTON based on photos which were shared by Free
23 American, the content and specific Telegram chats in which the comments were made.

94. The following pictures were shared by Free American in Telegram chat Cat Enjoys 2.0, a Telegram channel known to the FBI for hosting the influential members of Terrorgram. They included what appear to be FIREARM TWO and possibly FIREARM THREE, identified further below. The pictures are pasted below.

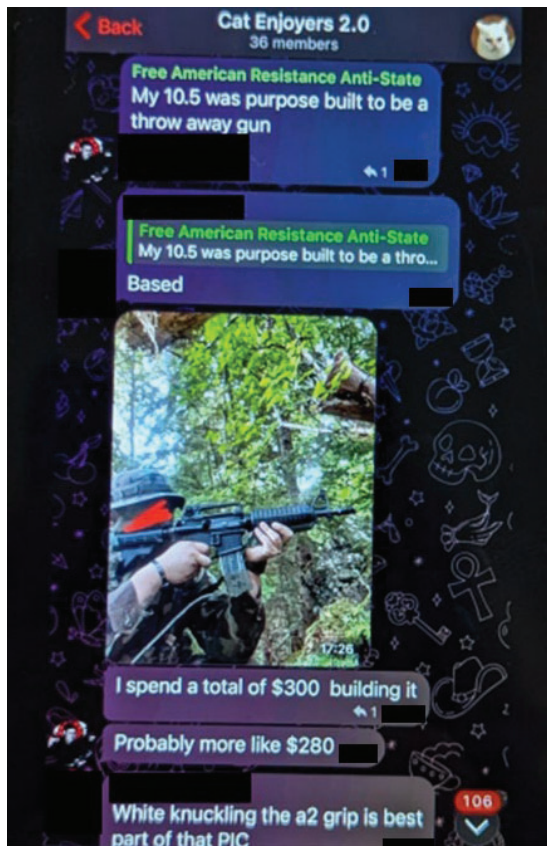


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95. Another shared photo in the Cat Enjoyers 2.0 channel included a firearm that appears to be FIREARM ONE and discussion which referenced the firearm as being a “10.5,” matching the same language previously used by BENTON to describe the weapon. The photo and comments are pasted below.

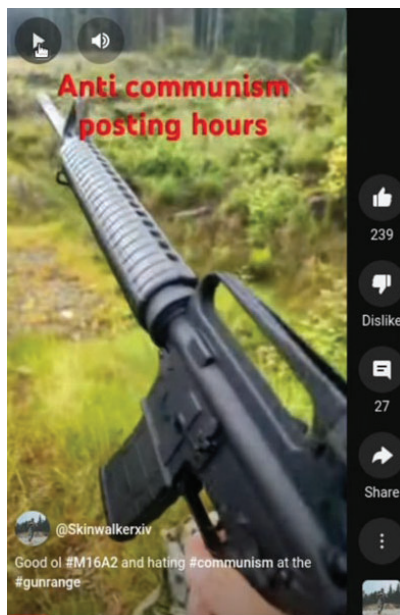


//

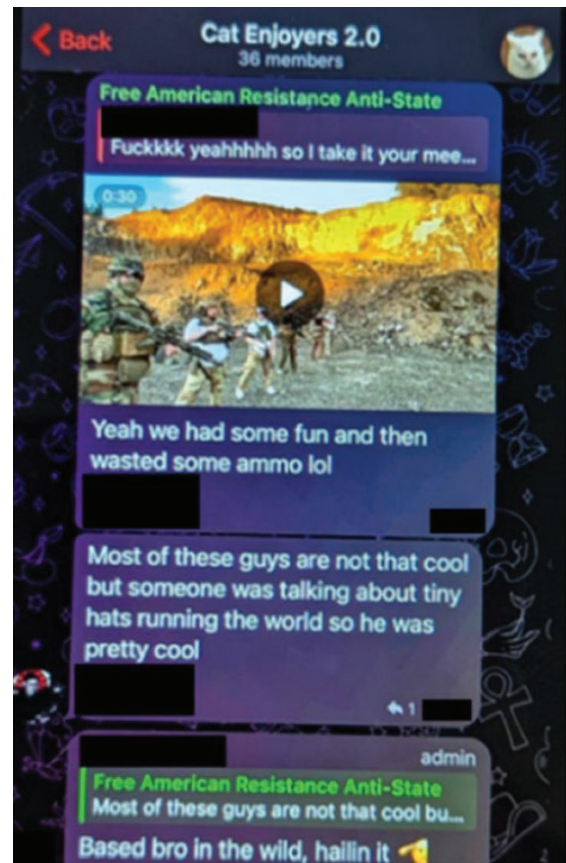
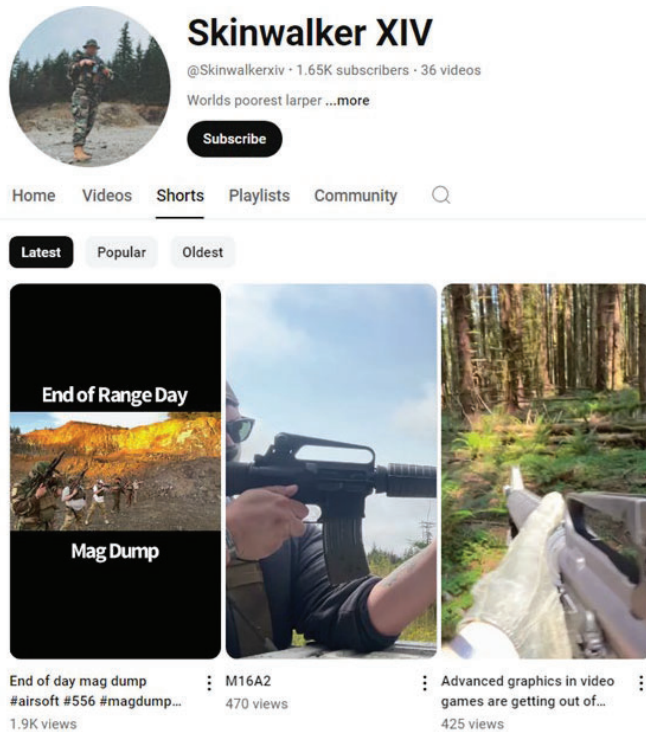
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96. Additionally, the photos included an AK47 style weapon and an M16-like firearm, which may be FIREARM THREE, identified further below, which appear to be the same firearms that have been shown in multiple videos on Skinwalkerxiv. Comparisons of the firearms are pasted below.



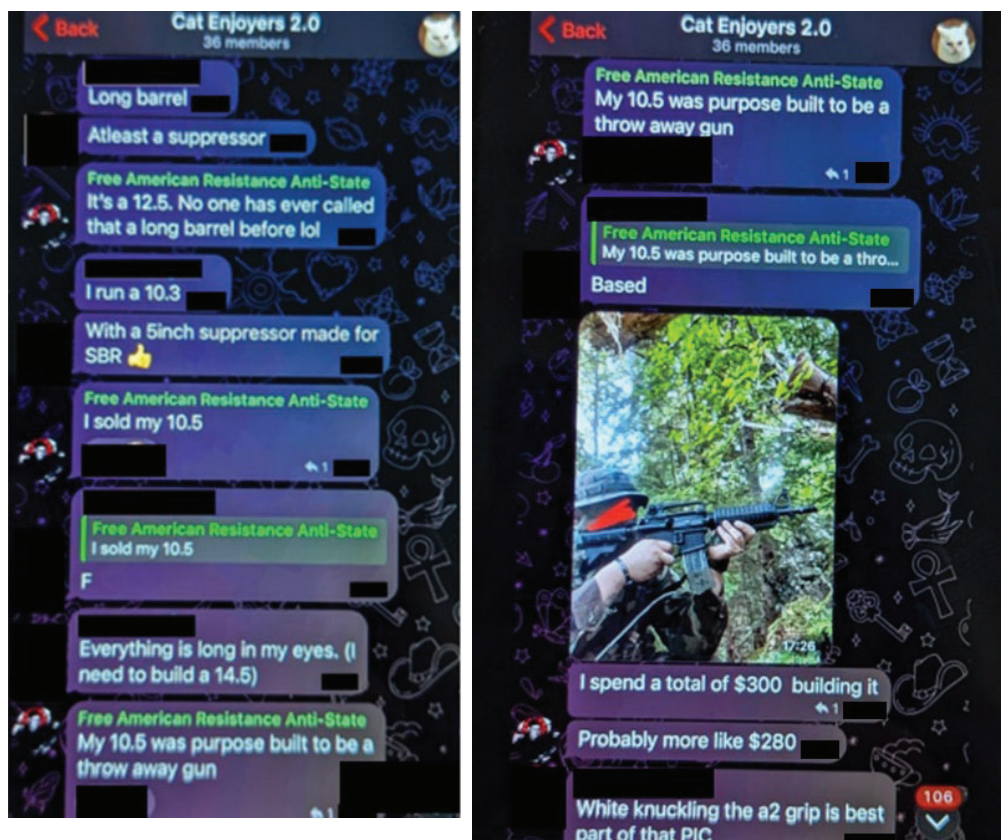
97. Additionally, SA Morgan reviewed a screenshot of a video shared by Free American, which has similar details as a video uploaded by Skinwalkerxiv in which a group of individuals are wearing military style gear and simultaneously shooting various firearms at what appears to be an outdoor makeshift gun range. The photos are pasted below.



Illegal Activities on Telegram

98. In Cat Enjoyers 2.0, Free American commented that the AR-15 style weapon was a “12.5” and that “No one has ever called that a long barrel before lol.” Based on my training and experience I again believe “12.5” is a reference to the length of the barrel of the weapon meaning the barrel is 12 and one-half inches long. This would constitute an SBR. Free American also commented “I sold my 10.5” and that the “10.5 was built to be a throw away gun.” Based on this statement, BENTON acknowledged

selling a firearm with a short barrel, which may be FIREARM ONE, which would constitute a violation of 18 U.S.C. § 933 Trafficking in firearms. Free American also stated it only cost approximately \$280 to build the firearm he reported selling. Photos of the conversation are pasted below.



99. Based on employment records provided by the state of Washington BENTON has earned \$32,236.33 in wages in the first two Quarters of 2024. This does not include money which BENTON receives as the result of his disability rating, he received upon separation from the Army. This makes the cost of recreating a similar illegal firearm within BENTON's financial means.

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Identification of FIREARM THREE

100. In August of 2024, FBI CHS-4 observed Free American make several posts in Cat Enjoys 2.0. These posts indicated that Free American was going to a gun range with “6 complete strangers” from a veteran group. These individuals were later identified as likely being part of the Facebook group “Veterans of Snohomish County.” Free American also stated, “sure hope it’s not the Feds” and “I hope they like NFA violations.”

101. This was later followed by a video which shows an individual I believe to be BENTON based on the stature and build of the individual; the weapon the individual is shooting, which appears to be a firearm that appears in multiple Skinwalkerxiv videos; the clothing worn by the shooter, including the military style hat and top the individual is wearing; and the location the video is filmed at. The video shows the firearm (hereinafter “FIREARM THREE”) shooting in a fully automatic fire capacity. Based on the previous discussion of conversions from semi-automatic firearms to machinegun above, I believe a drop-in auto sear was utilized to achieve this rate of fire of this firearm, in violation of the NFA. The range appears to be the same makeshift outdoor gun range shown in both the image shared by Free American and posted on Skinwalkerxiv, two accounts associated with BENTON. The clothing worn by the operator of FIREARM THREE in the video appears to be the same that appears in various social media platforms associated with BENTON including Telegram, YouTube, Instagram and images sent directly to FBI OCEs. A screenshot of the video, which shows FIREARM THREE firing fully automatic, is pasted below.



102. In the YouTube Short titled "#M16A2 content coming soon" posted by Skinwalkerxiv an M16-style rifle is shown, which I believe to be FIREARM THREE or a very similar weapon. The selector switch on the M16-style rifle is visible. Where the receiver pin hole for the full auto sear would be placed is clearly visible. There is no pin hole present in that location. The screenshot is pasted below.



1 103. This indicates to me that if the M16-style rifle shown on the
2 Skinwalkerxiv YouTube account since June of 2024 is FIREARM THREE, then a drop-
3 in auto sear would have to be utilized to convert the rifle into a fully automatic rifle.

4 104. Since August 2024 Free American has been observed by an FBI
5 UCE and made the following statement about attempting to elicit other individuals to
6 commit acts of violence, specifically to commit mass shootings against groups based on
7 their race, religion, or other protected statuses in order to become a “saint.” Free
8 American stated “Going into random chats and hyping up saints might get some weirdo
9 to become a saint because he knows people will love him.”

10 105. Following these comments an additional FBI OCE observed activity
11 by Free American in a separate Telegram chat titled “NRN Chat,” a group that has
12 approximately 130 members and is known to me to promote racist, antisemitic, and white
13 supremacist content. Specifically, Free American shared an image which highlights Dylann
14 Roof and states, “The hero the White race needs Not the one it Deserves” Free American
15 captioned the photo “Saint Roof mentioned.”

16 106. Free American went on to comment, “I fucking love the saints,”
17 “killing niggers supersedes Christ,” “Race First,” “whites lifting up whites to get higher
18 and higher scores¹³ is the only way forward,” “Everyone loves saints and any lurkers in
19 this chat, know that once you become a saint you will be in the annals of time forever as
20 a hero. You’re already hated for being White, and they’ll still hate you for being a White
21 warrior. May as well gain the love and adoration of millions of awakened Whites across
22 the world. Hail the Saints!” and finally, “Any sin of the past is instantly washed clean
23 with the blood of our enemies.”

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25 //

26
27 ¹³ A score is a reference to the number of individuals a mass shooter kills during their attack.

Meta Search Warrant Return

107. On August 9, 2024, United States Magistrate Judge Paula L. McCandlis from the Western District of Washington authorized a search warrant for the following Meta accounts associated with BENTON; Instagram account 67147451645 (1645) and Facebook account 6103.

108. A review of 1645 did not uncover any additional illegal activity but did uncover a few statements related to firearms and firearm laws. These include the following public comments made by 1645, “Concealed carry permits are gay, I don’t need a permit. I dont care about laws...” and “if you pulled a guy over and you saw an “unregistered SBR” in plain view in his back seat and he saud he was just coming home from the range would you arrest him?”

Digital Devices

109. I know based on my training and experience that images and videos which are uploaded to platforms such as Telegram, YouTube and Instagram must be uploaded from devices with internet access such as cell phones and laptops. Therefore, evidence that has been identified on these platforms through my investigation and additional potential evidence of the violation of Target Offenses will likely be on these types of devices which BENTON has access to.

110. Furthermore, after BENTON’s significant other identified surveillance BENTON presumably accessed the Telegram account Garmr to alert other members of the situation. Garmr also stated that they would utilize a laptop upon returning home to delete accounts. Thereby, demonstrating devices under the control of BENTON possess information he does not want accessible to possible law enforcement officers.

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BACKGROUND CONCERNING APPLE¹⁴

111. Apple provides a variety of services that can be accessed from Apple devices or, in some cases, other devices via web browsers or mobile and desktop applications (“apps”). As described in further detail below, the services include email, instant messaging, and file storage:

a. Apple provides email service to its users through email addresses at the domain names mac.com, me.com, and icloud.com.

b. iMessage and FaceTime allow users of Apple devices to communicate in real-time. iMessage enables users of Apple devices to exchange instant messages (“iMessages”) containing text, photos, videos, locations, and contacts, while FaceTime enables those users to conduct audio and video calls.

c. iCloud is a cloud storage and cloud computing service from Apple that allows its users to interact with Apple’s servers to utilize iCloud-connected services to create, store, access, share, and synchronize data on Apple devices or via icloud.com on any Internet-connected device. For example, iCloud Mail enables a user to access Apple-provided email accounts on multiple Apple devices and on iCloud.com. iCloud Photo Library and My Photo Stream can be used to store and manage images and videos taken from Apple devices, and iCloud Photo Sharing allows the user to share those images and videos with other Apple subscribers. iCloud Drive can be used to store presentations, spreadsheets, and other documents. iCloud Tabs and bookmarks enable iCloud to be used to synchronize bookmarks and webpages opened in the Safari web browsers on all of the user’s Apple devices. iCloud Backup allows users to create a backup of their device data.

¹⁴ The information in this section is based on information published by Apple on its website, including, but not limited to, the following document and webpages: “U.S. Law Enforcement Legal Process Guidelines,” available at <https://www.apple.com/legal/privacy/law-enforcement-guidelines-us.pdf>; “Manage and use your Apple ID,” available at <https://support.apple.com/en-us/HT203993>; “iCloud,” available at <http://www.apple.com/icloud/>; “Introduction to iCloud,” available at <https://support.apple.com/kb/PH26502>; “What does iCloud back up?,” available at <https://support.apple.com/kb/PH12519>; and “Apple Platform Security,” available at https://help.apple.com/pdf/security/en_US/apple-platform-security-guide.pdf.

1 iWork Apps, a suite of productivity apps (Pages, Numbers, Keynote, and Notes), enables
2 iCloud to be used to create, store, and share documents, spreadsheets, and presentations.
3 iCloud Keychain enables a user to keep website username and passwords, credit card
4 information, and Wi-Fi network information synchronized across multiple Apple devices.

5 d. Game Center, Apple's social gaming network, allows users of Apple
6 devices to play and share games with each other.

7 e. Find My allows owners of Apple devices to remotely identify and
8 track the location of, display a message on, and wipe the contents of iOS devices, as well
9 as share their location with other iOS users. It also allows owners of Apple devices to
10 manage, interact with, and locate AirTags, which are tracking devices sold by Apple.

11 f. Location Services allows apps and websites to use information from
12 cellular, Wi-Fi, Global Positioning System ("GPS") networks, and Bluetooth, to determine
13 a user's approximate location.

14 g. App Store and iTunes Store are used to purchase and download digital
15 content. iOS apps can be purchased and downloaded through App Store on iOS devices,
16 or through iTunes Store on desktop and laptop computers running either Microsoft
17 Windows or Mac OS. Additional digital content, including music, movies, and television
18 shows, can be purchased through iTunes Store on iOS devices and on desktop and laptop
19 computers running either Microsoft Windows or Mac OS.

20 112. Apple services are accessed through the use of an "Apple ID," an
21 account created during the setup of an Apple device or through the iTunes or iCloud
22 services. The account identifier for an Apple ID is an email address, provided by the user.
23 Users can submit an Apple-provided email address (often ending in @icloud.com,
24 @me.com, or @mac.com) or an email address associated with a third-party email
25 provider (such as Gmail, Yahoo, or Hotmail). The Apple ID can be used to access most
26 Apple services (including iCloud, iMessage, and FaceTime) only after the user accesses
27 and responds to a "verification email" sent by Apple to that "primary" email address.

1 Additional email addresses (“alternate,” “rescue,” and “notification” email addresses) can
2 also be associated with an Apple ID by the user. A single Apple ID can be linked to
3 multiple Apple services and devices, serving as a central authentication and syncing
4 mechanism.

5 113. Apple captures information associated with the creation and use of
6 an Apple ID. During the creation of an Apple ID, the user must provide basic personal
7 information including the user’s full name, physical address, and telephone numbers. The
8 user may also provide means of payment for products offered by Apple. The subscriber
9 information and password associated with an Apple ID can be changed by the user
10 through the “My Apple ID” and “iForgot” pages on Apple’s website. In addition, Apple
11 captures the date on which the account was created, the length of service, records of log-
12 in times and durations, the types of service utilized, the status of the account (including
13 whether the account is inactive or closed), the methods used to connect to and utilize the
14 account, the Internet Protocol address (“IP address”) used to register and access the
15 account, and other log files that reflect usage of the account.

16 114. Additional information is captured by Apple in connection with the
17 use of an Apple ID to access certain services. For example, Apple maintains connection
18 logs with IP addresses that reflect a user’s sign-on activity for Apple services such as
19 iTunes Store and App Store, iCloud, Game Center, and the My Apple ID and iForgot
20 pages on Apple’s website. Apple also maintains records reflecting a user’s app purchases
21 from App Store and iTunes Store, “call invitation logs” for FaceTime calls, “capability
22 query logs” for iMessage, and “mail logs” for activity over an Apple-provided email
23 account. Records relating to the use of the “Find My” service, including connection logs
24 and requests to remotely find, lock, or erase a device, are also maintained by Apple.

25 115. Apple also maintains information about the devices associated with
26 an Apple ID. When a user activates or upgrades an iOS device, Apple captures and
27 retains the user’s IP address and identifiers such as the Integrated Circuit Card ID number

1 (“ICCID”), which is the serial number of the device’s SIM card. Similarly, the telephone
2 number of a user’s iPhone is linked to an Apple ID when the user signs into FaceTime or
3 iMessage. Apple also may maintain records of other device identifiers, including the
4 Media Access Control address (“MAC address”), the unique device identifier (“UDID”),
5 and the serial number. In addition, information about a user’s computer is captured when
6 iTunes is used on that computer to play content associated with an Apple ID, and
7 information about a user’s web browser may be captured when used to access services
8 through icloud.com and apple.com. Apple also retains records related to communications
9 between users and Apple customer service, including communications regarding a
10 particular Apple device or service, and the repair history for a device.

11 116. Apple provides users with five gigabytes of free electronic space on
12 iCloud, and users can purchase additional storage space. That storage space, located on
13 servers controlled by Apple, may contain data associated with the use of iCloud-
14 connected services, including: email (iCloud Mail); images and videos (iCloud Photo
15 Library, My Photo Stream, and iCloud Photo Sharing); documents, spreadsheets,
16 presentations, and other files (iWork and iCloud Drive); and web browser settings and
17 Wi-Fi network information (iCloud Tabs and iCloud Keychain). iCloud can also be used
18 to store iOS device backups, which can contain a user’s photos and videos, iMessages,
19 Short Message Service (“SMS”) and Multimedia Messaging Service (“MMS”) messages,
20 voicemail messages, call history, contacts, calendar events, reminders, notes, app data
21 and settings, Apple Watch backups, and other data. Some of this data is stored on Apple’s
22 servers in an encrypted form but may nonetheless be decrypted by Apple. Records and
23 data associated with third-party apps, including the instant messaging service WhatsApp,
24 may also be stored on iCloud.

25 117. Account activity may also provide relevant insight into the account
26 owner’s state of mind as it relates to the offenses under investigation. For example,
27 information on the account may indicate the owner’s motive and intent to commit a crime

1 (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g.,
2 deleting account information in an effort to conceal evidence from law enforcement).

3 118. In my training and experience, evidence of who was using an Apple
4 ID and from where, and evidence related to criminal activity of the kind described above,
5 may be found in the files and records described above. This evidence may establish the
6 “who, what, why, when, where, and how” of the criminal conduct under investigation,
7 thus enabling the United States to establish and prove each element or, alternatively, to
8 exclude the innocent from further suspicion.

9 119. For example, the stored communications and files connected to an
10 Apple ID may provide direct evidence of the offenses under investigation. Based on my
11 training and experience, instant messages, emails, voicemails, photos, videos, and
12 documents are often created and used in furtherance of criminal activity, including to
13 communicate and facilitate the offenses under investigation

14 120. In addition, the user’s account activity, logs, stored electronic
15 communications, and other data retained by Apple can indicate who has used or
16 controlled the account. This “user attribution” evidence is analogous to the search for
17 “indicia of occupancy” while executing a search warrant at a residence. For example,
18 subscriber information, email and messaging logs, documents, and photos and videos
19 (and the data associated with the foregoing, such as geo-location, date and time) may be
20 evidence of who used or controlled the account at a relevant time. As an example,
21 because every device has unique hardware and software identifiers, and because every
22 device that connects to the Internet must use an IP address, IP address and device
23 identifier information can help to identify which computers or other devices were used to
24 access the account. Such information also allows investigators to understand the
25 geographic and chronological context of access, use, and events relating to the crime
26 under investigation.
27

121. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

122. Other information connected to an Apple ID may lead to the discovery of additional evidence. For example, the identification of apps downloaded from App Store and iTunes Store (such as Telegram or CashApp) may reveal services used in furtherance of the crimes under investigation or services used to communicate with co-conspirators. In addition, emails, instant messages, Internet activity, documents, and contact and calendar information can lead to the identification of co-conspirators and instrumentalities of the crimes under investigation.

123. Therefore, Apple's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Apple's services. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

CONCLUSION

124. Based on the information set forth herein, there is probable cause to search the above described TARGET ACCOUNT, as further described in Attachment A, for evidence, fruits and instrumentalities, as further described in Attachments B, of crimes committed by the individual listed in this affidavit and his co-conspirators, specifically violations of 18 U.S.C. § 922(o), unlawful possession of a machinegun; 26 U.S.C. §§ 5861(d) and 5845(a)(3), to receive or possess a firearm which is not registered to the possessor in the National Firearms Registration and Transfer Record; 18 U.S.C. § 933, trafficking in firearms; 18 U.S.C. § 641, stealing or retaining stolen property of the United States; 18 U.S.C. § 373, solicitation to commit a crime of violence; 18 U.S.C. §


1 372, conspiracy to impede or injure an officer; 18 U.S.C. § 249, hate crimes; 18 U.S.C. §
2 231, teaching or demonstrating the use of a firearm or explosive with intent that the
3 teaching be unlawfully used for a civil disorder; and 18 U.S.C. § 875, threats
4 communicated in interstate commerce.

5 125. Based on the facts set forth in this affidavit, I request that the Court
6 issue the proposed search warrant. Because the warrant will be served on Apple, who will
7 then compile the requested records at a time convenient to it, reasonable cause exists to
8 permit the execution of the requested warrant at any time in the day or night.

9 126. The affidavit and application are being presented by reliable
10 electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).
11
12

13 
14 JOSEPH RICO
15 Special Agent
Federal Bureau of Investigation

16 The above-named agent provided a sworn statement attesting to the truth of the
17 foregoing affidavit by telephone on the 13th day of December, 2024.
18

19 
20 THE HONORABLE BRIAN A. TSUCHIDA
21 United States Magistrate Judge
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27

ATTACHMENT A

Accounts to Be Searched

This warrant applies to information associated with the account kylecbenton@gmail.com that is stored at premises owned, maintained, controlled, or operated by Apple Inc., a company headquartered at One Apple Park Way, Cupertino, California 95014.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Apple Inc. (“Apple”)

To the extent that the information described in Attachment A is within the possession, custody, or control of Apple, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Apple, Apple is required to disclose the following information to the government for each account or identifier listed in Attachment A for the date range of approximately January of 2020, and September of 2024, unless otherwise indicated:

a. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers, email addresses (including primary, alternate, rescue, and notification email addresses, and verification information for each email address), the date on which the account was created, the length of service, the IP address used to register the account, account status, associated devices, methods of connecting, and means and source of payment (including any credit or bank account numbers);

b. All records or other information regarding the devices associated with, or used in connection with, the account (including all current and past trusted or authorized iOS devices and computers, and any devices used to access Apple services), including serial numbers, Unique Device Identifiers (“UDID”), Advertising Identifiers (“IDFA”),

Global Unique Identifiers (“GUID”), Media Access Control (“MAC”) addresses, Integrated Circuit Card ID numbers (“ICCID”), Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifiers (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Numbers (“MSISDN”), International Mobile Subscriber Identities (“IMSI”), and International Mobile Station Equipment Identities (“IMEI”);

c. The contents of all emails associated with the account, including stored or preserved copies of emails sent to and from the account (including all draft emails and deleted emails), the source and destination addresses associated with each email, the date and time at which each email was sent, the size and length of each email, and the true and accurate header information including the actual IP addresses of the sender and the recipient of the emails, and all attachments;

d. The contents of all instant messages associated with the account, including stored or preserved copies of instant messages (including iMessages, SMS messages, and MMS messages) sent to and from the account (including all draft and deleted messages), the source and destination account or phone number associated with each instant message, the date and time at which each instant message was sent, the size and length of

each instant message, the actual IP addresses of the sender and the recipient of each instant message, and the media, if any, attached to each instant message;

e. The contents of all files and other records stored on iCloud, including all iOS device backups, all Apple and third-party app data, all files and other records related to iCloud Mail, iCloud Photo Sharing, My Photo Stream, iCloud Photo Library, iCloud Drive, iWork (including Pages, Numbers, Keynote, and Notes), iCloud Tabs and bookmarks, and iCloud Keychain, and all address books, contact and buddy lists, notes, reminders, calendar entries, images, videos, voicemails, device settings, and bookmarks;

f. All activity, connection, and transactional logs for the account (with associated IP addresses including source port numbers), including FaceTime call invitation logs, messaging and capability query logs (including iMessage, SMS, and MMS messages), mail logs, iCloud logs, iTunes Store and App Store logs (including purchases, downloads, and updates of Apple and third-party apps), My Apple ID and iForgot logs, sign-on logs for all Apple services, Game Center logs, Find My and AirTag logs, logs associated with web-based access of Apple services (including all associated identifiers), and logs associated with iOS device purchase, activation, and upgrades;

g. All records and information regarding locations where the account or devices associated with the account were accessed, including all data stored in connection with AirTags, Location Services, Find My, and Apple Maps;

- h. All records pertaining to the types of service used;
- i. All records pertaining to communications between Apple and any person regarding the account, including contacts with support services and records of actions taken;
- j. All files, keys, or other information necessary to decrypt any data produced in an encrypted form, when available to Apple (including, but not limited to, the keybag.txt and fileinfolist.txt files).

Apple is hereby ordered to disclose the above information to the government within fourteen days of issuance of this warrant.

II. Information to be seized by the government

Evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 922(o), unlawful possession of a machinegun; 26 U.S.C. §§ 5861(d) and 5845(a)(3), to receive or possess a firearm which is not registered to the possessor in the National Firearms Registration and Transfer Record; 18 U.S.C. § 933, trafficking in firearms; 18 U.S.C. § 641, stealing or retaining stolen property of the United States; 18 U.S.C. § 373, solicitation to commit a crime of violence; 18 U.S.C. § 372, conspiracy to impede or injure an officer; 18 U.S.C. § 249, hate crimes; 18 U.S.C. § 231, teaching or demonstrating the use of a firearm or explosive with intent that the teaching be unlawfully used for a civil disorder; and 18 U.S.C. § 875, threats communicated in interstate commerce, beginning at a time unknown but occurring between approximately January of 2020, and September of 2024, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. All records, in whatever form stored, related to the preparatory steps taken in furtherance of the crimes identified herein;
- b. All records or information relating to the possession of a machinegun;
- c. All records or information related to receiving or possessing a firearm not registered to the possessor in the National Firearms Registration and Transfer Record;
- d. All records or information related to the possession of stolen property of the United States;
- e. All records or information related to the trafficking in firearms;
- f. All records or information related to the solicitation to commit a crime of violence;
- g. All records or information related to any conspiracy to impede or injure an officer;

- h. All records or information related to the commission of a hate crime;
- i. All records or information related to the teaching or demonstrating the use of a firearm or explosive with intent that the teaching be unlawfully used for a civil disorder;
- j. All records or information related to threats communicated in interstate commerce;
- k. All records or information pertaining to access or use of internet-based accounts with user-names to include “Kilo Blunton,” “Kiloblunton,” “@kiloBlunton,” “sk1n_walker,” “Garmr,” “@Skinwalkerxiv,” “Skinwalkerxiv,” and “@LiftWaffle”;
- l. All records or information pertaining to access or use of other internet-based accounts;
- m. Records or information pertaining to co-conspirators of the offenses of unlawful possession of a machinegun, receiving or possessing a firearm which is not registered to the possessor in the National Firearms Registration and Transfer Record, trafficking in firearms, stealing or retaining stolen property of the United States, solicitation to commit a crime of violence, conspiracy to impede or injure an officer, hate crimes, teaching or demonstrating the use of a firearm or explosive with intent that the teaching be unlawfully used for a civil disorder, and threats communicated in interstate commerce, including records and information that can assist law enforcement in identifying co-conspirators, their employers, and their locations;
- n. Stored photographs and videos of firearms or other weapons, evidence of suspected criminal activity, and/or the user of the phone and/or co-conspirators, including any embedded GPS data associated with these photographs;
- o. Stored text messages, as well as any messages in any internet messaging apps, including but not limited to Facebook Messenger, iMessage, Telegram, and similar messaging applications, related to the aforementioned crimes of investigation or that may show the user of the account and/or co-conspirators, including Apple iMessages,

Blackberry Messenger messages or other similar messaging services where the data is stored in the account;

p. Evidence of user attribution, that is who used, owned, or controlled the account at the time the things described in this warrant were created, edited, deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, “chats,” instant messaging logs, photographs, and correspondence;

q. Evidence indicating how and when the account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the email account owner;

r. Evidence indicating the account user’s state of mind as it relates to the crime under investigation; and

s. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their